

1. Ms. Azari is a secured creditor of the Debtor and, on December 12, 2019, filed a proof of claim in this bankruptcy. (*See* Claim No. 6)

2. The Debtor has filed an adversary proceeding on behalf of creditors in this bankruptcy challenging Ms. Azari's secured claim as an allegedly fraudulent transfer under Section 544(b) of the Bankruptcy Code. (*See Wansdown v. Azari*, Adv. Pro. No. 19-1450).

3. On December 31, 2019, Pelmadulla, the sole shareholder of the Debtor, filed an alleged unsecured claim in the amount of \$3,243,941.19. (*See* Claim No. 9).

4. Ms. Azari objects to unsubstantiated claims filed by creditors in this bankruptcy, such as the one filed by Pelmadulla.

5. On January 21, 2020, undersigned counsel wrote to counsel for Pelmadulla, Sanford P. Rosen, Esq. of Rosen, P.C., and requested additional documents that would support Pelmadulla's claim, "including, but not limited to, any loan documents, promissory notes, or correspondence reflecting any loan agreement between the Debtor and Pelmadulla," which was the basis of Pelmadulla's claim.

6. On January 24, 2020, Mr. Rosen responded that his firm has "followed up with [Pelmadulla] and will amend their claim accordingly."

7. To date, Pelmadulla has not amended its claim.

8. As such, Ms. Azari joins the Debtor's Claim Objection, adopting all of the arguments in the Debtor's April 22, 2020 filing.

Dated: May 14, 2020
New York, New York

BEYS LISTON & MOBARGHA LLP

By: _____/s/_____
Nader Mobargha, Esq.

641 Lexington Avenue, 14th Floor
New York, New York 10022
Telephone: (646) 755-3603
Facsimile: (646) 755-5229
Email: nmobargha@blmlp.com

*Attorneys for Secured Creditor
Azadeh Azari*